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Attorneys for Defendant NIKE, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

KELLY CAHILL SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-JR

DECLARATION OF DANIEL PRINCE IN
SUPPORT OF DEFENDANT NIKE, INC.'S
OPPOSITION TO NON-PARTY MEDIA
ORGANIZATIONS' MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF MOVING TO UNSEAL
JUDICIAL RECORDS AND TO OPPOSE
DEFENDANT'S MOTION TO SEAL

I, Daniel Prince, hereby declare as follows:

1. I am an attorney licensed by the Bar of the State of California, and am admitted *pro hac vice* to practice before the U.S. District Court for the District of Oregon. I am a Partner with the law firm of Paul Hastings LLP, counsel of record for Defendant Nike, Inc. (“Nike”) in the above-captioned matter. I have personal knowledge of the facts set forth in this Declaration, and if called to testify under oath, I could and would testify competently thereto.

2. I submit this Declaration in Support of Nike’s Opposition to Non-Party Media Organizations’ Motion to Intervene for the Limited Purpose of Moving to Unseal Judicial Records and to Oppose Defendant’s Motion to Seal.

3. On April 1, 2022, I met and conferred with counsel for Plaintiffs and Insider Inc., *d/b/a Business Insider*, Advance Local Media LLC *d/b/a Oregonian Media Group*, and American City Business Journals, Inc.’s *d/b/a Portland Business Journal* (collectively, the “Media Intervenors”). During that conference, I explained that the Protective Order entered in this case provides a process for designating materials as “Confidential” and/or “Attorneys’ Eyes Only,” and for challenging the designation of the same. I also explained that hundreds of filings (including exhibits) appear on the public docket and that the Court’s resolution of the limited number of issues pertaining to the Parties’ confidentiality designations (or challenges to the same) likely would resolve the Media Intervenors’ concerns about access to certain materials in this litigation. Despite this conference, the Media Intervenors proceeded to file their Motion to Intervene.

4. Shortly after filing their Motion, the Media Intervenors, through their counsel, requested to postpone a decision on their motion until the Court resolves the Parties’ sealing issues, which have been set on the Court’s under advisement calendar for May 16, 2022.

5. On April 11, 2022, three days after the Media Intervenors filed their motion, Plaintiffs requested to unseal the Declaration of Felicia Davis and supporting exhibits in support of Nike's Opposition to Plaintiffs' Motion for Class Certification.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of April, 2022, at Los Angeles, California.

/s/ Daniel Prince

Daniel Prince